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WRITER'S DIRECT NUMBER:
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September 23, 1983

*OLIN CORP - S P OLIVER
TXD 000607028*

By Express Mail

Mr. David Price
Superfund Enforcement, 6AW-SE
Environmental Protection Agency
InterFirst One Building
1201 Elm Street
Dallas, Texas 75270

Re: Consolidated Leasing & Terminals, Inc.
(formerly Seatrain Pacific Services, Inc./
Seapac Container Service, Inc.)
In the Matter of Former Olin Site
Wallisville Road, Houston, Texas
Our File No. 5027

Dear Mr. Price:

As we discussed on September 21, 1983 by telephone, we represent Consolidated Leasing & Terminals, Inc. a Delaware corporation, which was formerly named Seatrain Pacific Services, Inc. and then Seapac Container Service, Inc. (the "Respondent").

We submit this letter in response to the EPA's letter questionnaire to the Respondent of September 1, 1983.

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1. The Respondent is neither a past nor a present property owner at the site, has not submitted any draft closure plan and has no knowledge thereof.

It is unclear from your letter exactly what the site is composed of. Respondent has never occupied any premises on Wallisville Road. Respondent, however, during the period May, 1980 through May, 1983 operated an ocean container storage depot on Salina Street leased from Eureka Investment Company, a Texas corporation. A copy of the lease between Respondent and Eureka is enclosed. Respondent has no knowledge as to whether the Salina Street yard is encompassed within the original Olin Site or Wallisville Road.

Respondent did not handle any pesticide at the Salina Street and the depot was used only for the marshalling of empty containers.

2. Respondent was never an owner of this site and there was no agreement with the lessor as to responsibility for cleanup in respect of pesticides as Respondent had no knowledge of any pesticide contamination.

3. Unknown.

4. Unknown.

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5. Unknown.

6. Unknown.

7. Unknown.

By reason of the above, we suggest that you contact Eureka and that your file in respect of the Respondent be closed.

Thank you for your courtesy and cooperation.

Very truly yours,

HILL, BETTS & NASH

By: 

Mark M. Jaffe

MMJ:ie
Enclosure